



Department of Energy

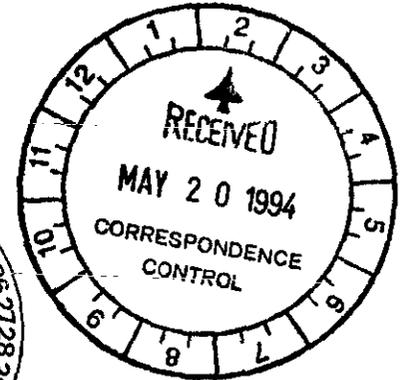
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P.O. Box 550  
Richland, Washington 99352

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Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. Roger F. Stanley, Director  
Tri-Party Agreement Implementation  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Sherwood and Stanley:

100-DR-1 OPERABLE UNIT (OU) SOIL WASHING TREATABILITY STUDY MILESTONE SCHEDULE EXTENSION REQUEST

The purpose of this letter is to officially inform the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) that the U.S. Department of Energy, Richland Operations Office (RL) will not complete pilot scale treatability study activities in the 100-DR-1 OU by August 31, 1994, per Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-15-07B. Enclosed please find Tri-Party Agreement Change Control Form M-15-94-05 submitted by RL to Ecology and EPA requesting a schedule extension to complete M-15-07B, per Tri-Party Agreement Article XL, Extensions, addressing provisions of Paragraphs 119 and 120. The remainder of this letter summarizes RL's demonstration of good cause for the M-15-07B schedule extension request, and rationale for RL, Ecology, and EPA 100-DR-1 OU Unit Manager agreement of modified and enhanced work scope to additionally justify Ecology and EPA approval of the schedule extension request.

OU Managers for the 100-DR-1 OU from RL, Ecology, and EPA agreed that completion of a pilot scale soil washing treatability test by August 31, 1994, would complete M-15-07B. In November 1993, RL provided data from completed bench scale soil washing treatability tests on samples collected from the 116-C-1 and 116-D-1B trenches to Ecology and EPA for review. In December 1993, upon completion of review of the data, RL, Ecology, and EPA 100-DR-1 OU Managers (Eric Goller, Ted Wooley, and Paul Beaver) agreed there was sufficient evidence to warrant a pilot scale soil washing treatability test. In January 1994, RL presented proposed work scope to Ecology and EPA 100-DR-1 OU Managers for the pilot scale test to be located at the 116-D-1B trench, including a process flow diagram for a pilot-scale system for use on these soils. In February 1994, the current 100-DR-1 OU Managers for RL, Ecology, and EPA (Glenn Goldberg, Phil Staats, and Paul Beaver, respectively) agreed on the work scope to complete M-15-07B, including the process flow diagram. This flow diagram was the starting point for the Westinghouse Hanford Company (WHC) acquiring required equipment and/or services to conduct the pilot-scale test for RL. WHC sent seven different requests for proposals (RFPs) to vendors of

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equipment standard to gravel pit operations (i.e., conveyor belts, spiral classifiers, and dewatering screens) to supplement existing equipment owned by RL on the Hanford Site to assemble a functional soil washing system immediately after documentation of unit manager agreement.

In March 1994, probable delay of equipment purchase and acquisition became apparent. The primary cause of delay was a lack of interested bidders as three RFPs issued to vendors failed to receive a single bid, and bids received on another RFP were considered unresponsive. In follow up calls to vendors who has previously expressed interest in receiving RFPs but failed to submit bids, WHC learned of numerous vendors' strenuous objection to the terms and conditions attached to functional specifications contained in the RFPs. The Federal Acquisition Regulations (FARs) require RL and it's contractors to solicit competitive bids from vendors when acquiring equipment, materials, and/or services. Any action taken by RL and it's contractors to comply with the FARs to solicit competitive bids requires inclusion of terms and conditions in addition to functional specifications. These terms and conditions act as criteria by which bids are evaluated for adequacy and compared to identify, then select, a best bid. A consistent message expressed by vendors was that it was not worth winning contract award for the subject RFPs due to the unreasonable time and resource expenditure necessary to prepare a bid compliant with the RFPs' terms and conditions. Less time, effort, and resource expenditure was required to win contract awards elsewhere.

In April 1994, concurrent with RL's verbal communication with Ecology and EPA 100-DR-1 Unit Managers of the potential procurement delay, WHC aggressively initiated the procurement process a second time by securing a new vendor list of potential bidders to reissue the same RFPs. WHC required acquisition of all equipment in order to conduct the treatability test as scoped. WHC accomplished compilation of a new vendor list by contacting vendors by telephone and explaining exact equipment specifications, and including any vendor on the list expressing interest and capability of supplying the equipment. In addition, all vendors were queried on delivery times and expedited delivery possibilities. To encourage response to the RFPs, WHC contacted the vendors intermittently to answer questions and to reaffirm interest in receiving bids. By April 30, 1994, all RFPs received acceptable bids; however, vendor deliver times on some items exceeded the requested delivery date of May 15, 1994, by as much as 10 weeks, even after expedited delivery incentives were offered.

By examination of scheduled tasks required to complete the scope of the subject soil washing test, RL asserts that despite exercise of reasonable diligence in procurement/acquisition of equipment required to meet work scope originally agreed by RL, Ecology, and EPA 100-DR-1 OU Unit Managers to complete M-15-07B, RL has incurred unrecoverable schedule delays due to compliance with applicable regulations governing contracting, procurement, and acquisition procedures.

Tri-Party Agreement Change Control Form M-15-94-05 is a request for a seven month extension to complete the original work scope defined to complete

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M-15-07B (same scope is contained in proposed interim milestone M-15-07E), and it is an agreement to complete additional bench and pilot scale soil washing tests by July 31, 1995, (proposed interim milestones M-15-07F, -07G, and -07H). The purpose of the 116-D-1B trench treatability test work scope is to gain information for RL, Ecology, and EPA to assess the adequacy of soil washing as a viable volume reduction technology on a pilot scale. The purpose of conducting additional tests is to evaluate volume reduction efficiencies on a variety of soil types, levels of contamination, and system design target performance levels. Please note the seven month schedule extension requested for completion of proposed M-15-07E is dependent on many factors including vendor delivery times for all necessary equipment, system assembly time, shakedown testing requirements, availability of limited resources (i.e., operators and technicians) to conduct the test, and weather conditions.

Ecology and EPA approval of Change Control Form M-15-94-05 is not anticipated to delay RL's scheduled submittal of Focused Feasibility Studies or Interim Remedial Measure Proposed Plans to the regulators, and RL maintains there should be no cause to delay regulator issuance of Records of Decision (RODs) for 100 Area OUs. Should Ecology or EPA require removal of a waste site in a ROD, it is recognized by lead RL, Ecology, and EPA 100 Area OU Unit Managers that contingency can be written into 100 Area source OUs RODs allowing use of a contaminated soil volume reduction technology (i.e., soil washing) as a cost efficiency initiative to reduce waste disposal costs. Confidence for continued consideration of soil washing is based on results from bench scale testing. However, all agencies agree there are numerous data gaps and information needs regarding engineering scale up from bench scale to full remediation and financial feasibility issues left unresolved to date. A key issue to resolve is the cost of volume reduction treatment (i.e., soil washing) verses the cost of bulk disposal of contaminated soils. Unit Manager agreement on the work scope for the soil washing pilot scale testing will enable RL to provide information to resolve the issues of engineering scale up and financial feasibility. This agreement of work scope is documented in Change Control Form M-15-94-05, which includes significant expansion of work scope originally defined for M-15-07B.

RL recognizes the need to aggressively proceed with actions to complete work scope originally defined to complete M-15-07B (proposed M-15-07E) and the additional work scope proposed in three additional interim milestones included in Change Control Form M-15-94-05. On April 30, 1994, RL directed WHC to continue procurement of equipment to complete work scope of the test as agreed by RL, Ecology, and EPA 100-DR-1 OU Managers (proposed M-15-07E). In addition, RL will use all available measures to secure remaining FY 1994 funding allocated for 100-DR-1 OU FY 1994 test operations for any additional procurement of equipment required for FY 1995 test operations defined in work scope agreement identified in proposed interim milestones M-15-07G and -07H. It should also be noted that any schedule extension into FY 1995 should take into consideration "Refocusing of the Environmental Restoration Program" efforts to establish a new technical baseline to achieve Environmental Restoration Program objectives.

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Please address any comments or questions regarding this correspondence to  
Mr. Eric Goller on (509) 376-7326 or RL's 100-D Reactor Area source OU Manager  
Mr. Glenn Goldberg on (509) 376-9552.

Sincerely,



Patrick W. Willison  
Acting Hanford Project Manager

END:EDG

cc w/encl:

B. Austin, WHC  
S. Balone, EM-442  
P. Beaver, EPA  
T. Demmitt, BHI  
D. Glenn, CH2M Hill  
P. Staats, Ecology  
T. Wintczak, WHC  
EDMC, H6-08

cc w/o encl:

M. Harmon, EM-442  
R. Henckel, WHC  
J. Monhart, EM-442  
D. Nylander, Ecology  
J. Patterson, WHC

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Change Number M-15-94-05	<b>Federal Facility Agreement and Consent Order          Change Control Form</b> Do not use blue ink. Type or print using black ink.	Date May 13, 1994
Originator E. D. Goller		Phone 376-7326
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title 100-DR-1 Operable Unit Treatability Study Milestone Revision (M-15-07B)		
Description/Justification of Change Delete Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-15-07B "Complete 100-DR-1 operable unit (OU) Treatability Study Activities" due August 31, 1994 and replace with the four milestones as shown below:  <b>M-15-07E</b> - DOE shall start pilot scale soil washing treatability study activities at the 116-D-1B trench in the 100-DR-1 OU as defined and agreed upon by U. S. Department of Energy, Richland Operations Office (RL), State of Washington Department of Ecology (Ecology), and U. S. Environmental Protection Agency (EPA) 100-DR-1 Unit Managers (Attachment 1) by March 31, 1995.  <b>M-15-07F</b> - DOE shall submit a treatability study test report for bench scale soil washing tests on 116-F-4 crib soils by June 10, 1994.  <b>M-15-07G</b> - DOE shall complete pilot scale soil washing treatability study activities on soils excavated from the 116-F-4 crib. Completion date: July 31, 1995 [date dependant upon completion of work scope and schedule definition (RL, EPA, and Ecology 100-FR-1 OU Unit Manager agreement required) by July 15, 1994].  <b>M-15-07H</b> - DOE shall complete pilot scale soil washing treatability study activities on feed material from two additional sources (approximately 100 cubic yards each) using existing equipment acquired to complete milestones M-15-07E and M-15-07H (no significant additional equipment procurement required) by July 31, 1995 [date dependant upon completion of feed source identification and work scope/schedule definition (RL and regulator feed material source OUs unit manager agreement required) by October 31, 1994].  Good cause for this schedule extension request is unanticipated schedule delays incurred by RL due to compliance with applicable regulations governing contracting, procurement, and acquisition procedures, despite exercise of reasonable diligence in procurement/acquisition of equipment required to meet work scope originally agreed by RL, Ecology, and EPA 100-DR-1 OU Unit Managers. RL, Ecology, and EPA agree the work scope and activities required above are necessary to evaluate the soil washing technology as a viable volume reduction treatment technology for potential inclusion in remedial action design.		

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Impact of Change

This change will delay completion of the current scope of the deleted milestone M-15-07B by eleven months. The scope of work required to complete M-15-07E through M-15-07I will provide detailed information to evaluate the adequacy of soil washing as a viable volume reduction technology for 100 Area OU waste liquid waste disposal sites. Funding in the FY 1995 budget allocation is assumed to be sufficient for conducting field operations to complete test objectives.

Affected Documents

100 Area Soil Washing Test Plan (DOE/RL-92-51), and Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D, Work Schedule.

Approvals                      \_\_\_ Approved                      \_\_\_ Disapproved

P. W. Willison \_\_\_\_\_  
DOE

Date

D. R. Sherwood \_\_\_\_\_  
EPA

Date

R. Stanley \_\_\_\_\_  
Ecology

Date

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

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P. W. Willison, RL (R. D. Belden, WHC)	D. R. Sherwood, EPA R. F. Stanley, Ecology	Incoming: 9402676 Xref 9452866D 36289

Subject: REQUEST FOR EXTENTION OF 100-DR-1 OPERABLE UNIT TREATABILITY STUDY  
MILESTONE M-15-07B

## INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
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		W. T. Dixon	H6-21	
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		T. M. Wintczak, Assignee	H6-27	
		EPIC	H6-08	X
		100 Area Pilot Scale Soil Washing File	H6-08	

Enclosure is the same as outgoing letter number 9452866D.

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